

1 STEELE LLP  
2 John C. Steele, State Bar No. 179875  
3 Tanya C. McCullah, State Bar No. 279614  
4 17272 Red Hill Avenue  
5 Irvine, California 92614  
6 Telephone: 949.222.1161  
7 Fax: 949.221.9500  
8 Email: jsteele@steellellp.com; tmccullah@steellellp.com

9  
10 Attorneys for Defendant  
11 MTC FINANCIAL INC. dba TRUSTEE CORPS  
12

13 UNITED STATES DISTRICT COURT  
14  
15 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

16 TAMARA REEDER,  
17 Plaintiff,

18 Case No.: 3:23-cv-05986-RFL  
19 Action filed: November 20, 2023

20 v.  
21

22 SELENE FINANCE, LP (SF); MTC  
23 FINANCIAL INC. dba TRUSTEE  
24 CORPS (MTC),  
25 Defendants

26 DEFENDANT MTC FINANCIAL INC.  
27 dba TRUSTEE CORPS' FIRST  
28 AMENDED NOTICE OF MOTION TO  
DISMISS COMPLAINT OF PLAINTIFF  
TAMARA REEDER

[Rule 12(B)(6)]

Hearing Date: February 20, 2024

Hearing Time: 10:00 a.m.

Judge: Rita F. Lin

Ctrm: Courtroom 15 – 18<sup>th</sup> Floor

26 TO THE HONORABLE COURT, AND TO ALL PARTIES AND THEIR  
27 ATTORNEYS OF RECORD HEREIN:

28  
DEFENDANT MTC FINANCIAL INC.'S SECOND AMENDED NOTICE OF MOTION  
TO DISMISS FIRST AMENDED COMPLAINT

1           **PLEASE TAKE NOTICE** that Defendant MTC Financial, Inc. dba Trustee  
2 Corps' Motion to Dismiss the Complaint of Plaintiff Tamara Reeder ("Plaintiff") will  
3 be heard on February 20, 2024, at 10:00 a.m., in Courtroom 15, 18<sup>th</sup> Floor, of the  
4 above-entitled Court located at 450 Golden Gate Ave., San Francisco, CA 94102.

6 | Date: January 2, 2024

STEELE LLP

*Johgr*

---

John C. Steele  
Attorneys for Defendant  
MTC Financial Inc. dba Trustee Corps

**PROOF OF SERVICE**

I, Raymond Soriano, declare:

I am a citizen of the United States and employed in Orange County, California. I am over the age of eighteen years and not a party to this action. My business address is 17272 Red Hill Avenue, Irvine, California 92614. On January 2, 2024, I served a copy of the following document(s):

**DEFENDANT MTC FINANCIAL INC. dba TRUSTEE CORPS' FIRST AMENDED  
NOTICE OF MOTION TO DISMISS COMPLAINT OF PLAINTIFF TAMARA  
REEDER**

- By transmitting via electronic filing the document(s) listed above using my email address ([rsoriano@steelellp.com](mailto:rsoriano@steelellp.com)) and the electronic filing service GreenFiling Service to the email address set forth below:
- By enclosing the documents in an envelope or package provided by an overnight carrier and addressed to the persons below and by placing the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier:
- By depositing the document(s) listed above in a sealed envelope with prepaid postage with the United States Postal Service, Irvine, California, or by placing the envelope for collection and mailing following our ordinary business practices.

Tamara Reeder  
5632 Weaver Place  
Oakland, CA 94619  
*PRO SE*

I am readily familiar with this firm's business practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope, postage prepaid.

- By transmitting via my email address ([rsoriano@steelellp.com](mailto:rsoriano@steelellp.com)) the document(s) listed above to the person(s) at the e-mail address(es) set forth below.

1 I declare under penalty of perjury under the law of the State of California  
2 and the United States that the foregoing is true and correct.  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

/s/ Raymond Soriano  
Raymond Soriano